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August 28, 2019

VIA ECF AND HAND DELIVERY

Hon. Richard J. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman,

We write on behalf of Defendant Harald Joachim von der Goltz regarding the government's motion to compel the production of communications with attorneys from Mossack Fonseca & Co. and two law firms associated with Defendant Ramses Owens (Dkt. No. 110). As discussed at the May 29, 2019 conference, Mr. von der Goltz has no basis to contest the government's motion because the privilege the government seeks to disturb is not Mr. von der Goltz's to assert (or to waive). Mr. von der Goltz's communications with attorneys from Mossack Fonseca and the Owens firms occurred in his capacity as a representative of certain entities—not his personal capacity. Nor does Mr. von der Goltz currently have the power to assert the rights of those entities or make decisions about waiver on their behalf. As a result, while he disputes the allegations against him contained in the motion, Mr. von der Goltz takes no position on it.

Respectfully submitted,

/s/ William Burck
William Burck

quinn emanuel urquhart & sullivan, llp

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